



# CITIZENS TELEPHONE COOPERATIVE, INC.

328 W. Main Street

P.O. Box 127

New Auburn, WI 54757-0127

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## Certification of CPNI Filing

February 2, 2006

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of Secretary  
445 12th Street, SW  
Washington, D.C. 20554

Re: EB-06-TC-060

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Bryon McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Respectfully submitted,


Dennis L. Bachman  
EVP / General Manager  
Citizens Telephone Cooperative, Inc.

Enclosures

cc: Bryon McCoy, Telecommunications Consumers Division

**ANNUAL CERTIFICATION – Customer Proprietary Network Information  
Procedures of Citizens Telephone Cooperative, Inc.**

I, Dennis L. Bachman hereby certify that I have personal knowledge that Citizens Telephone Cooperative, Inc. has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Citizens Telephone Cooperative, Inc.. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: 

By: Dennis L. Bachman  
Executive Vice President

Date: February, 2, 2006

## **Certification of CPNI Filing**

### **Citizens Telephone Cooperative, Inc.**

Citizens Telephone Cooperative, Inc. hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Citizens Telephone Cooperative, Inc. takes its statutory responsibility to protect its customers' CPNI seriously and therefore does not sell, rent or otherwise disclose customers' CPNI to other entities. Further, Citizens Telephone Cooperative, Inc. does not currently use, nor allow its affiliates to use, any customers' CPNI in marketing activities. Any request for CPNI is immediately forwarded to Dennis L. Bachman, the General Manager of Citizens Telephone Cooperative, Inc.. Citizens Telephone Cooperative, Inc.'s employees have been educated about CPNI, federal regulations and Citizens Telephone Cooperative, Inc.'s statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal. Further, Citizens Telephone Cooperative, Inc. does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.